

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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CHLOÉ, S.A.S., J. CHOO LIMITED :  
 :  
 : Plaintiffs, : Civil Action No.: 07 CV 6491 (WHP)  
 :  
 : - against - :  
 :  
 KEN CHEN a/k/a SHU CHEN a/k/a XIANG :  
 CHEN, DANIEL DOE, GODDESS :  
 TRADING d/b/a : **NOTICE OF PLAINTIFFS' MOTION FOR**  
 GODDESSTRADING@HOTMAIL.COM, : **ENTRY OF DEFAULT JUDGMENT AND**  
 LUXUNG GOODS, LUXURY GOODS, : **PERMANENT INJUNCTION, AGAINST**  
 TERRY DOE d/b/a : **DEFENDANTS LUXUNG GOODS, RANDY**  
 AZNTERRY911@HOTMAIL.COM, JASON : **DOE, FRANCISCO DOE, W. FEI ZENG,**  
 DOE d/b/a JARRY326@YAHOO.COM.CN, : **HENG FA INC., NICE HANDBAGS, 265**  
 FASHION HANDBAGS, BENNY DOE a/k/a : **CANAL BOOTH #4, 421A BROADWAY,**  
 YU LIN, JEANCARLO DOE, JOSEPH a/k/a : **BENNY DOE A/K/A DENNY DOE A/K/A YU**  
 JOSE DOE a/k/a JOSE CHONG WEN, SISI : **LIN AND FOR ENTRY OF STATUTORY**  
 a/k/a CECI DOE, TOP LUXURY : **DAMAGES AGAINST DEFENDANT BENNY**  
 HANDBAGS d/b/a : **DOE A/K/A DENNY DOE A/K/A YU LIN**  
 LUXURYHANDBAGS277@YAHOO.COM, :  
 FRANCISCO DOE, BEN DOE, CARLOS :  
 DOE a/k/a CARLOS RENE TSE SIO, :  
 INSTYLE LUXURY HANDBAGS, LIN LIN :  
 NAN a/k/a CORINA DOE a/k/a QIMIAO HU :  
 a/k/a QI MIAO HU, KENNY DOE a/k/a YE :  
 GUO a/k/a GUO Q YE, NEWCOME :  
 TRADING d/b/a TOSCA, QUICK GLOBAL :  
 SHIPPING, HOWARD EXPRESS :  
 SHIPPING, RANDY DOE, JAE MAN YOO, :  
 YAN HE XIA, WAI KIT WONG, CHEN LI :  
 YU, CHEN X. JIANG, W. FEI ZENG, :  
 CHENG CHEN, XIANXN CAI, FU :  
 ALEJANDRO CHANG, WAI KIT LEW, :  
 ENYI HUANG, YUE XU, SONG GAO, :  
 LISA WU, JIMMY NG, TUAN PHAN, LING :  
 CAI, LISA CHAN YAN FEN CHEN, P.S.K. :  
 AMERICA, INC., HENG FA INC., CHEN :  
 STAR GIFT SHOP, JOEY'S GIFT SHOP, :  
 INC., CATSE CO., INC., SHEN XING GIFT :  
 SHOP INC., NEW WEALTH TRADING, :  
 INC. d/b/a TOSCA USA, TOSCA :  
 HANDBAGS, NICE HANDBAGS, 265 :  
 CANAL BOOTH #16, 265 CANAL BOOTH :  
 #5, 265 CANAL BOOTH #4, 277 CANAL :  
 ADJACENT H-3D, 421A BROADWAY, and :  
 various JOHN and JANE DOES and XYZ :  
 COMPANIES (UNIDENTIFIED), :  
 :  
 : Defendants. :  
 :  
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**PLEASE TAKE NOTICE** that Plaintiffs CHLOÉ, S.A.S., (“Chloé”) and J. CHOO, LIMITED (“Jimmy Choo”) (collectively, “Plaintiffs”) will and hereby do move before the Honorable Judge Pauley, of this Court for Entry of Default Judgment and Permanent Injunction Against Defendants Luxung Goods, Randy Doe, Francisco Doe, W. Fei Zeng, Heng Fa Inc., Nice Handbags, 265 Canal Booth #4, 421A Broadway, Benny Doe a/k/a Denny Doe a/k/a Yu Lin (collectively, “Defaulting Defendants”) and for Statutory Damages, Against Defendant Benny Doe a/k/a Denny Doe a/k/a Yu Lin.

This Motion is made pursuant to Fed. R. Civ. Pr. 55 on the basis that the Defaulting Defendants have not answered or otherwise appeared to defend themselves and a Certificate of Default has been entered by the Clerk of Court. Thus it is appropriate for final judgment to be entered against all Defaulting Defendants, including a permanent injunction. Further, Plaintiffs seek an award of statutory damages against one Defaulting Defendant, based on the records before the Court.

Plaintiffs’ Motion is based on this Notice of Motion, the accompanying Memorandum of Law, the Affidavit of Julie Bookbinder and the exhibits attached thereto, oral argument, if any, and all materials in the Court’s file.

Dated: August 1, 2008

Respectfully submitted,  
GREENBERG TRAURIG, LLP

By: /s/ Katherine Compton  
Harley I. Lewin (HL 1819)  
Scott Gelin (SG 9599)  
James Donoian (JD 9052)  
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-and-

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*Admitted pro hac vice*

*Attorneys for Plaintiffs*  
*Chloé, S.A.S., J. Choo Limited*

**CERTIFICATE OF SERVICE**

The undersigned certifies that a copy of the foregoing instrument was caused to be served by First Class Mail upon the parties set forth below in accordance with Rule 5, Federal Rules of Civil Procedure on August 1, 2008:

421A Broadway  
New York, NY 10013-2519  
c/o Jimmy Ng

W. Fei Zeng  
Booths 2 & 3  
265 Canal St.  
New York, NY 10013-6010

Luxung Goods  
277 Canal Street H-2-C  
New York, NY 10013

265 Canal Street Booth #4  
New York, NY 10013

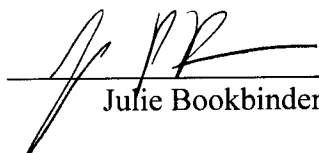
Nice Handbags  
Booth #11  
265 Canal St.  
New York, NY 10013-6010

Heng Fa Inc.  
Booths 2 & 3  
265 Canal St.  
New York, NY 10013-6010

Benny Doe a/k/a Denny Doe a/k/a  
Yu Lin  
89 Crosby Street  
New York, New York 10013

Francisco Doe  
277 Canal Street, H-3-D  
New York, New York 10013

Randy Doe  
421A Broadway  
New York, New York 10013

  
Julie Bookbinder